

FILED

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRZEJ BORYGA,

Defendant.

CAUSE NO.

1:23-cr-00139-JRS-KMB

INDICTMENT

The Grand Jury charges that:

COUNT 1

18 U.S.C. § 875(c)

(Interstate Communication of Threat to Injure)

On multiple occasions between on or about July 24, 2022, and on or about July 25, 2022, in the Southern District of Indiana, Indianapolis Division, defendant ANDRZEJ BORYGA knowingly and willfully transmitted in interstate commerce from the State of Indiana, to somewhere outside the State of Indiana, threats to kill and injure other persons, in that the defendant made telephone calls to the office of the Anti-Defamation League of New York, in New York, New York, and threatened to kill Jewish people. Specifically,

- On July 24, 2022, the defendant left a voicemail stating, "Cut your fucking head off you filthy fucking kikes...it is my duty, all our- to kill you motherfuckers, to slaughter you";
- On July 24, 2022, the defendant left another voicemail stating, "I will fucking kill you...I can't wait to motherfucking cut your fucking head off and put around display on 3rd Avenue": and
- On July 25, 2022, the defendant left a voicemail stating, "My grandfather [unintelligible] SS officer...he personally shoot [sic]

120 Jews for target practice...I will kill more than that...You all have to die, you motherfuckers.”

All in violation of Title 18, United States Code, Section 875(c).

SPECIAL FINDING

Defendant ANDRZEJ BORYGA intentionally selected the targets of the offense because of the actual and perceived religion of employees and members of the Anti-Defamation League.

COUNT 2

18 U.S.C. § 875(c)

(Interstate Communication of Threat to Injure)

On or about August 5, 2022, in the Southern District of Indiana, Indianapolis Division, defendant ANDRZEJ BORYGA knowingly and willfully transmitted in interstate commerce from the State of Indiana, to somewhere outside the State of Indiana, threats to kill and injure other persons, in that the defendant made a telephone call to the office of the Anti-Defamation League of the Southwest Region, Houston, Texas, and threatened to kill Jewish people. Specifically, the defendant left a voicemail stating “Your days are numbered. We’ll take care of your ass, cut your fucking head off around [sic] display, you fucking filthy animals.”

All in violation of Title 18, United States Code, Section 875(c).

SPECIAL FINDING

Defendant ANDRZEJ BORYGA intentionally selected the targets of the offense because of the actual and perceived religion of employees and members of the Anti-Defamation League.

COUNT 3
18 U.S.C. § 875(c)
(Interstate Communication of Threat to Injure)

On multiple occasions between on or about August 18, 2022, and on or about October 12, 2022, in the Southern District of Indiana, Indianapolis Division, defendant ANDRZEJ BORYGA knowingly and willfully transmitted in interstate commerce from the State of Indiana, to somewhere outside the State of Indiana, threats to kill and injure other persons, in that the defendant made multiple telephone calls to the office of the Anti-Defamation League for the Mountain States, Denver, Colorado, and threatened to kill Jewish people. Specifically,

- On August 18, 2022, the defendant left a voicemail stating “You’re going to suck my dick, Nazi cock, you motherfucker, Jewish bitches, before I cut your fucking throat”;
- On September 29, 2022, the defendant left a voicemail stating “I can’t wait to graduate as a Nazi, I am ready for you motherfuckers. Cut your fucking head off...I will kill you motherfucker with pleasure”; and
- On October 12, 2022, the defendant left a voicemail stating “Pretty soon we’re gonna have oven party, filthy fucking kikes. I’m gonna bake your fucking ass.”

All in violation of Title 18, United States Code, Section 875(c).

SPECIAL FINDING

Defendant ANDRZEJ BORYGA intentionally the targets of the offense because of the actual and perceived religion of employees and members of the Anti-Defamation League.

COUNT 4
18 U.S.C. § 875(c)
(Interstate Communication of Threat to Injure)

On or about October 1, 2022, in the Southern District of Indiana, Indianapolis Division, defendant ANDRZEJ BORYGA knowingly and willfully transmitted in interstate commerce

from the State of Indiana, to somewhere outside the State of Indiana, threats to kill and injure other persons, in that the defendant made a telephone call to the office of the Anti-Defamation League of Nevada, Las Vegas, Nevada, and threatened to kill Jewish people. Specifically, the defendant left a voicemail stating "I can't wait to graduate, cut your fucking head off, you piece of shit...I get an orgasm when I fucking kill Jewish fucking people."

All in violation of Title 18, United States Code, Section 875(c).

SPECIAL FINDING

Defendant ANDRZEJ BORYGA intentionally selected the targets of the offense because of the actual and perceived religion of employees and members of the Anti-Defamation League.

A TRUE BILL: 



ZACHARY A. MYERS
United States Attorney
Southern District of Indiana

KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice

By:



Peter A. Blackett /mpb
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Trial Attorney, Civil Rights Division